

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:25-CV-20978-MD

DELTEC BANK & TRUST LIMITED,

Plaintiff,

v.

MICHAEL CARBONARA; IBANERA LLC,
and IBANERA PRIVATE LIMITED,

Defendants.

**DECLARATION OF ABRAM I. MOORE IN SUPPORT OF PLAINTIFF'S *EX PARTE*
MOTION FOR AN ORDER AUTHORIZING ALTERNATIVE SERVICE OF PROCESS
ON DEFENDANT IBANERA PRIVATE LIMITED**

I, Abram I. Moore, declare and state as follows:

1. I am counsel of record for Plaintiff Deltec Bank & Trust Limited ("Plaintiff" or "Deltec") in the above captioned action. I submit this declaration in support of Plaintiff's motion for an order authorizing alternate service on Defendant Ibanera Private Limited ("Ibanera Singapore"). I am personally knowledgeable of the matters set forth in this declaration and, if called upon to do so, could competently testify to the following facts set forth below.

2. Attached as Exhibit A is a true and correct copy of the detailed "Business Profile" for Ibanera Singapore, which I downloaded from the website for Singapore's Accounting and Corporate Regulatory Authority ("SACRA").¹

3. Attached as Exhibit B is a true and correct copy of the detailed "Business Profile" for Snorrason Online which I also downloaded from the SACRA website.

¹ See SACRA, business profile search, <https://www.bizfile.gov.sg/buy-info/info-products/business-profile> (last visited Apr. 30, 2025).

4. I have reviewed dozens of emails from prior to the filing of this action in which my client corresponded with Bjorn Snorrason at the email address bjorn@ibanera.com.

5. I also searched the internet for additional e-mail addresses for Mr. Snorrason, and found the following possible addresses (bjornsnorrason@gmail.com; bjorn@ibanera.com; bjorn@dalpay.com; bsnorra@internet.is) through the following online sources: <https://contactout.com/Bjorn-Snorrason-21023494> and <https://rocketreach.co/person?start=1&pageSize=10&link=https:%2F%2Fwww.linkedin.com%2Fin%2Fbsnorra>.

6. On April 14, 2025, I emailed a copy of the original complaint (DE 1) to Mr. Snorrason at the following email addresses: bjorn@ibanera.com; bjorn.snorrason@ibanera.com; bjornsnorrason@gmail.com; bjorn@dalpay.com; and bsnorra@internet.is. Exhibit C is a true and correct copy of this email. None of these emails bounced back.

7. I have also messaged Mr. Snorrason through WhatsApp using a phone number at which my client reached Mr. Snorrason this year. Mr. Snorrason did not respond to my message, but the application did notify me that “Bjorn Snorrason uses a default timer for disappearing messages in new chats. New messages will disappear from this chat 7 days after they’re sent, except when kept.”

8. I have reviewed email correspondence from prior to the filing of this action in which my client emailed routinely corresponded with Ibanera by sending emails to support@ibanera.com; compliance@ibanera.com and ops@ibanera.com.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2nd day of May, 2025, at Chicago, Illinois.

/s/ *Abram I. Moore*
Abram I. Moore